

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

KAREN M. DONNELLY, individually, and )  
on behalf of all others similarly situated, )

Plaintiff, )

v. )

APPLIED BUSINESS SERVICES, INC., )  
D/B/A SECURITY COLLECTION )  
AGENCY, both as a company as well as )  
its various owners, )

Defendant. )

Case No. 4:16-CV-00502

**JURY TRIAL DEMANDED**

Removal of Cause No. 16SL-CC00863

St. Louis County Circuit Court

**NOTICE TO PLAINTIFF OF FILING OF NOTICE OF REMOVAL**

TO: Steven A. Donner  
Thomas R. Applewhite  
Donner Applewhite, Attorneys at Law  
1108 Olive Street, Suite 200  
St. Louis, Missouri 63101  
Attorneys for Plaintiff

PLEASE TAKE NOTICE that Defendant Applied Business Services, Inc., d/b/a Security Collection Agency has this day filed in the United States District Court for the Eastern District of Missouri, Eastern Division, a Notice of Removal of this action, a true and correct copy of which is served herewith.

Dated: April 11, 2016

Respectfully submitted,

SPENCER FANE BRITT & BROWNE LLP

By: /s/ Patrick T. McLaughlin

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Attorneys for Defendant Applied Business  
Services d/b/a Security Collections Agency

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 11<sup>th</sup> day of April, 2016, the foregoing document was filed electronically with the Clerk of the Court, to be served by the Court's electronic notification system and served via U.S. Mail upon the following attorneys of record:

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Attorneys for Plaintiff

/s/Patrick T. McLaughlin